FILED
AUG 19 2015
LA SALLE COUNTY CIRCUIT CLERK
THIRTEENTH JUDICIAL CIRCUIT OF ILLINOIS

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
LASALLE COUNTY, ILLINOIS

Kevin R. Kramer, Petitioner,	)	
v.	)	No. 15 F 153
Julia C. Eickmeier, Respondent.	)	

ANSWER TO PETITION FOR MODIFICATION FOR CUSTODY

NOW COMES the Respondent, Julia C. Eickmeier, by and through her attorney James M. Durkee of Malmquist and Geiger, and hereby states in Answer to Petitioner's Petitioner for Modification For Custody as follows:

1. Admit;

2. Admit;

3. Deny;

a. Respondent admits to some denial of visitation, but denies the same to be an attempt to alienate the minor child from the Petitioner, but rather for the protection of the minor child.

b. Respondent neither admits nor denies this allegation, but objects to the reference of such police reports without attaching the same, and further objects to the use of the term "unfounded", and is unable to respond to the same. Respondent further denies this allegation as sufficient to bring a petition for custody within the 2-year period.

c. Respondent neither admits nor denies this allegation, but states that at least one Order of Protection at the time of filing the instant Answer remains pending, although concedes it was denied on an emergency basis only.

d. Deny;

e. Deny.

WHEREFORE, Respondent Julia Eickmeier respectfully requests this Honorable Court enter an Order denying the relief prayed by Petitioner, and for all further relief this Court deems equitable and just.

RESPECTFULLY SUBMITTED,

Julia Eickmeier, Julia Eickmeier

James M. Durkee

One of Her Attorneys

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, including statements of insufficient knowledge as to the truth to certain allegations, and except as to matters therein stated to be on information and belief, and as to such matters, the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Dated: 8.05.15

Julia Eickmeier

Julia Eickmeier

PREPARED BY:
James M. Durkee, Bar #6296297
Malmquist and Geiger
415 Liberty St.
Morris, IL 60450
(815) 942-5072

PROOF OF SERVICE

The undersigned certifies under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, that on 8-05, 2015, a copy of the foregoing instrument was served upon the following:

Robert B. Steele
Aplington, Kaufman, McClintock, Steele & Barry Ltd.
P.O. Box 517
160 Marquette St.
La Salle, IL 61301

Nenya Giles, Asst. Attorney General
Attorney for the State of Illinois
16 West Cass St., 4th Floor
Joliet, IL 60432

by the method specified below:

__ by **personally delivering** a copy to the person in charge of the above referenced office before the hour of 5:00 p.m. on the date specified.

✓ by enclosing the same in an envelope addressed to such person at the address indicated, with postage fully prepaid, and by depositing said envelope in a U. S. Post Office **Mail** Box in Morris, Illinois, on the date specified, before 5:30 p.m.

__ by transmitting a copy by facsimile to the **facsimile** number noted under the name(s) above before 5:30 p.m.

__ by enclosing a copy in an envelope addressed to such person at the address indicated, with postage fully prepaid, by **certified mail, return receipt requested**, and by depositing said envelope in a U.S. Post Office Mail Box in Morris, Illinois, on the date specified, before 5:30 p.m.

__ by serving a copy of the foregoing instrument to such person in **open Court** on the date specified.

_____ by delivering a copy to such person through a **third party commercial carrier**-including deposit in the carrier's pick up box or drop off with the carrier's designated contractor- enclosed in a package, plainly addressed to such person, with the delivery charge fully prepaid, on or before 5:30 p.m. on the date stated.

_____ by transmitting a copy via **e-mail** to such person at the above designated e-mail address on or before 5:30 p.m. on the date specified.

_____ by transmitting a copy to such person through a service provider that provides an **electronic in-box** to such person's in-box address on or before 5:30 p.m. on the date specified.

Connie J. Corrotto

eickmeier.pos